

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH

Case No.: 9:22-CV-80660-RAR

UNITED STATES OF AMERICA;

Plaintiff,

v.

PAUL J. MANAFORT, JR.,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE GOVERNMENT'S COMPLAINT**

Defendant, through this unopposed Motion, respectfully requests the Court extend his time to Respond to the Complaint by thirty days. As good cause for the requested extension, Defendant states as follows:

1. The Motion is unopposed. This is the third extension of Defendant's response deadline that Defendant has sought in this case.
2. Defendant's response to the Complaint is presently due on August 10, 2022.
3. The Parties are engaged in settlement discussions that both sides reasonably hope will resolve this case. As part of these settlement discussions, information has been gathered and exchanged by the Parties.
4. Since requesting his prior extension, the Government continues to evaluate Defendant's settlement proposal. Settlement of tax and FBAR matters requires layers of review both at the Department of Justice and the IRS, and that this process is ongoing. Defendant served

his settlement proposal and supporting information on or about July 12, 2022. The Government represents that it requires additional time to complete this evaluation.

5. Forcing the Parties to litigate a motion to dismiss or other threshold motions in the meantime will distract from and be detrimental to settlement efforts.

WHEREFORE, Defendant respectfully requests that this Court extend his deadline to respond to the complaint by thirty days, until **September 9, 2022**.

LOCAL RULE 7.1(a)(3) CONFERRAL

The undersigned has conferred with counsel for the Government and the Government does not oppose the relief this motion requests.

Dated: August 8, 2022

Respectfully submitted,

**MARCUS NEIMAN RASHBAUM
& PINEIRO LLP**

/s/ Derick R. Vollrath
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Counsel for Defendant

CERTIFICATE OF SERVICE

I certify that on August 8, 2022, I filed the foregoing document through the Court's CM/ECF system which has caused service to be made upon all counsel of record in this case.

/s/ Derick Vollrath